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January 31, 2012

Mr. Ezra Rapoport
Executive Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607-4700

Subject: Comments Regarding the Sustainable Communities Strategy
Alternative Land Use Scenarios 3, 4, and 5

Dear Director Rapoport:

This letter transmits the Transportation Authority of Marin (TAM) Board's comments regarding Alternative Land Use Scenarios 3, 4, and 5 for the region's Sustainable Communities Strategy (SCS).

The Board acknowledges the challenge in developing and adopting the SCS Preferred Scenario. Given the reality that the SCS will be a regional blueprint for future transportation and land use, TAM's SCS Ad Hoc Committee provides a forum in Marin County for consideration of the various proposals leading up to the final selection of an SCS. In the course of its work, the SCS Ad Hoc Committee developed the following general comments regarding the Alternative Land Use Scenarios 3, 4, and 5, which represent Marin County's input to the SCS.

The following comments address the Land-Use Scenarios. The TAM Board will continue to evaluate the effect of the proposed SCS Transportation Networks and may provide additional comments at a future date.

MARIN COMMENTS ON THE ALTERNATIVE LAND USE SCENARIOS

1. The jurisdictions that comprise TAM understand the value of regional planning that coordinates jobs, housing, and transportation investments to affect climate change by reducing greenhouse gas emissions. We recognize the coming demographic changes to the region, particularly household formation trends and an aging population and how that will impact housing needs and the demand for housing types other than traditional low density, detached single-family development.

2. The environmental resources inherent to Marin have been respected with dedication of conservation areas. Regional agencies must continue to protect these areas, and recognize the limited resources available for development, including crucial water supply limitations and coastal and agricultural lands protection.
3. The jobs numbers in all three Alternative Land-Use Scenarios are inflated, and are unrealistic expectations about the potential for jobs growth in Marin County. As stated in our last comment letter, the SCS job forecast for Marin is greater than the job growth rate we have experienced between 1995 and 2010. Today, there are very few vacant sites remaining in Marin. The assumption that approximately 1,000 new jobs a year will materialize in Marin is false. While there will be some redevelopment in areas along the 101 corridor over the next 30 years, the limited road and transit network cannot accommodate the level of development assumed by ABAG. This assumed growth and resultant in-commuting will contribute greatly to vehicle miles traveled and greenhouse gas contributions. We recognize, in addition, that there are other communities in the Bay Area desiring the jobs growth ABAG assumed in Marin County. Therefore, we ask that the Preferred Scenario include jobs projections at the same proportion of the household growth for the county.
4. Marin has been a leader in reducing greenhouse gas emissions with effective facilities and innovative programs that support behavioral changes, such as Marin's Safe Routes to School program, the Non-Motorized Transportation Pilot Program, the Marin Energy Authority, and a high proportion of hybrid and electric vehicle ownership. Our unique efforts in converting driving trips to other modes should be recognized as an integral part of our efforts in reducing greenhouse gas emissions.
5. We concur with the assumption that growth in Marin should be focused along the Highway 101 corridor and around transit stations, with consideration given to air quality near the highway and planning for expected sea level rise. Communities without Highway 101 frontage or transit stations should encourage mixed-use development served by transit.
6. Our local jurisdictions remain attentive regarding the development of local Regional Household Needs Assessment (RHNA) requirements. We request that good communication continue on how the SCS affects RHNA. Toward that end, we look forward to ABAG's response the questions posed at the end of this letter.
7. Marin's unique place and role as a recreational, environmental and agricultural resource in the Bay Area should be a primary consideration in long-term regional planning scenarios.

We look forward to reviewing and participating in the development of the Draft Preferred Scenario. We welcome further coordination that recognizes constraints—such as water supply, transit, school capacity, land-use limitations, and social equity—and that protects our inherent recreational and agricultural environment that many have worked hard to protect here in Marin.

With regard to public outreach, TAM has received numerous comments from local community members frustrated with the lack of clear information about the purpose and process of the SCS. TAM recommends that ABAG and MTC develop a simple Frequently Asked Questions document that will address questions common questions to the SCS and related policies, such as RHNA, the Regional Transportation Plan, and the One Bay Area Grant:

1. If ABAG's assumptions for growth exceed a jurisdiction's general plan assumptions, what will be ABAG's enforcement? Note that local general plans often include requirements on buildings that have resulted from inclusive community planning processes. Major changes in building types, heights, and setbacks are constraints for the local community and can trigger significant impacts under the California Environmental Quality Act (CEQA).
2. What resources will there be to implement ABAG's assumptions for growth?
3. What will be ABAG's enforcement through incentives or disincentives?
4. Will the SCS EIR evaluate local environmental impacts of ABAG's growth assumptions so that local agencies can use the EIR for general plan amendments?
5. How are foreclosed units and vacant commercial space factored into the growth assumptions? Do the forecasts incorporate the provisions of AB 1103, which allows certain foreclosed units to be counted toward RHNA?

Finally, the responsibility to implement the various proposals leading up to, and including, adoption of the SCS, lies solely with individual local governments. To that end, individual jurisdictions in Marin County are responding directly to ABAG informally or through formal correspondence from their councils. We thank ABAG staff for their work to date, and ask that ABAG hear and attend to our cities' and towns' concerns.

We appreciate the opportunity to submit our comments and look forward to working with ABAG, MTC, and the public to lead the Bay Area into compliance with the SB 375 plan for greenhouse gas emissions reduction.

Sincerely,



Alice Fredericks
TAM Board Chair
Transportation Authority of Marin

cc: Steve Heminger, Metropolitan Transportation Commission
Marin County SCS Ad Hoc Committee
TAM Commissioners